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January 4, 2011

VIA CM/ECF

Honorable Renee Marie Bumb, U.S.D.J.
United States District Court
For the District of New Jersey
Mitchell H. Cohen Courthouse
1 John F. Gerry Plaza
Camden, New Jersey 08101

**RE: Holtec International Corporation v. Preferred Metal Technologies,
Inc. v. UPS Ground Freight, Inc. d/b/a UPS Freight f/k/a Overnite
Transportation
Civil Action No. 09-CV-274(RMB/AMD)
Our File No. 2514.114**

Dear Judge Bumb:

We represent the Third-Party Defendant, UPS Ground Freight, Inc. d/b/a UPS Freight f/k/a Overnite Transportation ("UPS Freight").

We write to respectfully request an extension of the return date of our motion for summary judgment from January 18, 2011 to January 31, 2011. This request is respectfully made so UPS Freight may file and serve its response to Third-Party Plaintiff's opposition to UPS Freight's Motion for Summary Judgment on January 24, 2011 instead of the current date of January 10, 2011. We previously invoked Local Civil Rule 7.1(d)(5) and this is our second request. All counsel have graciously consented to our request.

This requested extension would not impinge or affect any other dates set by the Court.

We thank the Court for its attention to this matter.

Respectfully submitted,

Nowell Amoroso Klein Bierman, PA



S/ Thomas C. Martin

Thomas C. Martin

TCM/bb

Cc: Honorable Ann Marie Donio, U.S.M.J.
Abigail Bowen, Esq.
Steven Kudatzky, Esq.